

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

SCARLETT PAVLOVICH,

Plaintiff,

v.

NEIL GAIMAN and AMANDA PALMER,

Defendants.

Case No.: 3:25-CV-00078-JDP

**DECLARATION OF PLAINTIFF
SCARLETT PAVLOVICH**

I, SCARLETT PAVLOVICH, declare and affirm under the penalty of perjury under the laws of the United States of America: The information contained in this Declaration is correct to the best of my knowledge, information, and belief. This Declaration is made in good faith to assert the truthfulness of the following statements:

1. My legal name is Molly Scarlett Pavlovich. I am over the age of eighteen, and I am fully competent to make this declaration and testify to the matters asserted herein. The facts stated herein are based on my personal knowledge.

2. I am citizen of New Zealand. However, I do not live in New Zealand and have not lived there since June of 2024.

3. I have been living in St. Andrews, Scotland where I am attending university since August of 2024 and continue to live there with plans to remain in Scotland for years to come.

4. Because of the abuse I suffered, I have no intention whatsoever of ever returning to New Zealand either to live or even visit and I don't consider New Zealand my home regardless of the fact that I have citizenship in that country.

5. I am currently going through a process with the Scottish Women's Rights Center for discretionary leave to remain indefinitely in the UK.

6. I met Amanda Palmer when I was 22 years old. At that time, I had no money, without stable means of income or secure housing, and in a fragile state with my mental health.

7. On February 1, 2022, I accepted an offer from Amanda Palmer to work as a nanny, babysitting her child with Neil Gaiman. This offer of employment included watching their child at their separate homes and completing various household services at both houses.

8. Amanda Palmer, Neil Gaiman and myself are the only people with knowledge of the agreement I made with Amanda Palmer to work as a live-in nanny for her and Neil Gaiman.

9. On February 4, 2022, I met Neil Gaiman for the first time at the ferry terminal and then a few hours later I proceeded to Neil Gaiman's home where he was with his son.

10. On February 4, 2022, Neil Gaiman raped me for the first time.

11. Between February 4, 2022, and February 25, 2022, I fulfilled my work obligations of working as a nanny and completing other household services for Amanda Palmer and Neil Gaiman. Throughout this time, I was being sexually abused by Neil Gaiman and received no compensation for my nanny and household services.

12. As of February 26, 2022, after enduring weeks of sexual abuse and while performing nanny services, I still had not received any compensation for the services I completed.

13. March 7, 2022, I told Amanda Palmer that Neil Gaiman had been sexually abusing me.

14. Eventually I received payment on March 25, 2022 for the nannying services I performed, but this was only after the sexual abuse had stopped when Neil Gaiman left the country.

15. Neil Gaiman required that I sign the Independent Contractor Agreement after my employment with Neil Gaiman and Amanda Palmer had been terminated.

16. Neil Gaiman sexually abused me either when I was home alone with him, or when his minor child was in the house. There were never any other adults present who witnessed the sexual abuse I experienced.

17. I am currently a student attending university with very few, if any, assets, and would not be able to provide security for Neil Gaiman or Amanda Palmer's defense costs.

18. Where I live in St. Andrews, Scotland, is approximately 11,000 miles away from and 13 hours behind in time of Auckland, New Zealand.

19. Living in Scotland prevents me from seeing any New Zealand-based therapists in-person.

20. I have attempted to get therapy/rehabilitative care while living in Scotland by calling and was told by Mia, a therapist who works with the ACC, that I am not able to receive any rehabilitative care or therapy services through the ACC because I was living abroad.

21. I received an email from Mia that confirmed I cannot receive any therapy/rehabilitative care through the ACC because I live out of the country. A true and correct copy of that email is attached hereto as **Exhibit 1**.

22. Because of my current status as a full-time student attending university in St. Andrews, Scotland, I do not have the financial means or resources to travel to New Zealand. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 11, 2025.



SCARLETT PAVLOVICH